

Exhibit M
Responses to 2nd RFP

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

VERY REVEREND GEORGES F. DE LAIRE, J.C.L.,

Plaintiff,

v.

Case No. 1:21-CV-00131-JD

GARY MICHAEL VORIS; ANITA CAREY; ST.
MICHAEL'S MEDIA a/k/a CHURCH MILITANT,

Defendants.

ST. MICHAEL'S MEDIA A/K/A CHURCH MILITANT **SECOND** SUPPLEMENTAL
RESPONSES TO VERY REVEREND GEORGES F. DE LAIRE, J.C.L.S. FIRST
REQUESTS FOR PRODUCTION

Defendant, St. Michael's Media a/k/a Church Militant, by and through its counsel, submits the following as its **second** supplemental responses to the Very Reverend Georges F. De Laire, J.C.L.'s First Requests for Production dated June 28, 2021:

1. All documents related to the investigation, writing, and publication of the article entitled "NH Vicar Changes Dogma Into Heresy," published on January 17, 2019, including but not limited to all notes, recordings of interviews, communications about the article, and records related to discussions with sources.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire's newsgathering privilege and the First Amendment. Subject to these objections, Church Militant states that it has no responsive documents in its possession, custody or control.

2. All documents related to the investigation, script writing, and publication of the video entitled “The Vortex” Attacking the Good Guys,” published on April 15, 2019, including but not limited to all notes, recordings of interviews, communications about the video, and records related to discussions with sources.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence. Subject to these objections, Church Militant states that it has no responsive documents in its possession, custody or control.

3. All documents related to the investigation, writing, and publication of the article entitled “NH Diocese Violates Parishioners’ Rights to Demolish Church,” published on June 25, 2019, including but not limited to all notes, recordings of interviews, communications about the video, and records related to discussions with sources.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence. Church Militant located a June 24, 2019 email exchange between Anita Carey and Christine Niles concerning background research for the June 25, 2019 article. Church Militant maintains the article is protected by the newsgathering privilege.

4. Copies of all articles and videos published, posted, or promoted on the Church Militant Website which mention or discuss Father de Laire.

RESPONSE: All responsive documents are found on Church Militant’s public website and have been previously produced.

5. Copies of all drafts of articles and videos, whether published or unpublished, authored in whole or in part by a Church Militant employee or representative which discuss, describe, or mention Father de Laire.

RESPONSE: Other than those produced in response to Request 4, Church Militant has no responsive documents in its custody or control.

6. All communications to or from any and all Church Militant employees which in any way discuss or references Father de Laire.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence. Subject to these objections, Church Militant has no responsive documents that predate de Laire’s threats of litigation.

7. All communications with any source who provided information about Father de Laire in connection with the publication of the article “NH Vicar Changes Dogma Into Heresy,” attached as Exhibit C to the Complaint.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control that predate this litigation and that relate to de Laire.

8. All communications with any source who provided information about Father de Laire in connection with the publication of the video “The Vortex: Attacking The Good Guys.”

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control that predate this litigation and that relate to de Laire.

9. All communications with any source who provided information about Father de Laire in connection with the publication of the article “NH Diocese Violates Parishioners’ Rights to Demolish Church.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control.

10. All communications with any representative of the Roman Catholic Church which mention, discuss, refer to, or relates to Father de Laire.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects to this request because it is vague and ambiguous in that it does not define “representative of the Roman Catholic Church” and the term may include information that is protected by New Hampshire’s newsgathering privilege and the First Amendment. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control.

11. All internet postings published by Defendants, whether on the Church Militant Website or elsewhere, concerning Father de Laire.

RESPONSE: Other than those produced in response to Request 4, Church Militant has no responsive documents in its custody or control.

12. All documents consulted or reviewed in preparing answers to Father de Laire’s First Set of Interrogatories to Defendant St. Michael’s Media a/k/a Church Militant..

RESPONSE: Other than those produced in response to Request 4, Church Militant has no responsive documents in its custody or control.

13. All notes taken by Defendants and/or their employees, agents, representatives, or anyone else acting on their behalf, in the process of drafting any article, video, or internet post concerning Father de Laire.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Church Militant further objects because the request seeks information that is not relevant and not likely to lead to

the discovery of admissible evidence. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control.

14. All “comments” made via the internet on churchmilitant.com or elsewhere responding directly to articles or videos published or posted in any location by Defendants, including any comments which have since been deleted but which are archived by Defendants, which concern or mention Father de Laire.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Subject to these objections, Church Militant responds that all responsive documents are found on its website and have been previously produced.

15. All communications from visitors to the Church Militant Website concerning or referencing Father de Laire, or referencing any article which references Father de Laire.

RESPONSE: Other than those produced in response to Request 14, Church Militant has no responsive documents in its custody or control and have been previously produced.

16. All communications between Defendants and the Saint Benedict Center in Richmond, New Hampshire, or with any members of the Slaves of the Immaculate Heart who operate the Saint Benedict Center, which concern, mention, or reference Father de Laire.

RESPONSE: Church Militant objects to this request because it is overbroad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire’s newsgathering privilege and the First Amendment. Subject to these objections, Church Militant has no responsive documents in its possession, custody or control that pre-date the filing of this lawsuit.

17. All social media posts or comments you wrote, published, uploaded, or otherwise made concerning or referencing Father de Laire, whether on Twitter, Facebook, Instagram, Reddit, TikTok, or any other social media platform.

RESPONSE: Other than those produced in response to Requests 4 and 14, Church Militant has no responsive documents in its custody or control.

18. All documents concerning the facts, incidents, or allegations contained in the Complaint, or that you may use to controvert the allegations of the Complaint.

RESPONSE: Church Militant objects to this request because it is vague, over broad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire's newsgathering privilege, the First Amendment, the attorney client privilege and the work product doctrine. Church Militant has no documents in its custody or control because responsive documents may have been produced under the Attorneys' Eyes Only provision of the protective order.

19. All documents concerning the Answer, including documents that refer or relate to the factual denials made in the Answer and the affirmative defenses asserted therein.

RESPONSE: Church Militant objects to this request because it is vague, over broad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire's newsgathering privilege, the First Amendment, the attorney client privilege and the work product doctrine.

20. All communications with any person relating to this Action and/or any of the allegations, averments and/or denials made in the Pleadings (i.e., the Complaint and the Answer), as well as any documents concerning such communications.

RESPONSE: Church Militant objects to this request because it is vague, over broad and unduly burdensome. Church Militant further objects because the information is protected by New Hampshire's newsgathering privilege, the First Amendment, the attorney client privilege and the work product doctrine. Subject to these objections, Church Militant has no responsive documents.

21. All affidavits, witness statements, and/or transcripts given or received by you concerning the claims and defenses asserted by any party in this action.

RESPONSE: Church Militant has no responsive documents other than the transcripts of depositions taken in this case.

22. With respect to each expert witness you retained or specially employed to provide expert testimony in this Action:

- a. All reports prepared by each expert witness, if any;
- b. The curriculum vitae of each expert witness, including all publications authored by the witness within the preceding ten (10) years;
- c. All documents and data considered and/or relied upon by each expert in forming any opinion or conclusion, including any exhibits to be used as a summary of the opinion;
- d. All documents provided to, prepared by, or prepared at the direction of each expert witness in this Action;
- e. Your communications with each expert, including without limitation all requests for information from an expert not originally provided to the expert in this Action;
- f. Documents sufficient to identify the compensation to be paid for the study and testimony in this case; and
- g. A list of all other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

RESPONSE: Church Militant has not retained an expert and reserves all objections. Defendants have retained an expert and reserve the right to rely on his opinions.

23. All documents you reviewed or consulted in answering the Interrogatories, if any.

RESPONSE: Church Militant will produce responsive documents, if any.

24. All documents identified in your responses to the Interrogatories, if any.

RESPONSE: Church Militant will produce responsive documents, if any.

Respectfully submitted,

MADDIN, HAUSER, ROTH & HELLER, P.C.

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